

CORRES. CONTROL  
INCOMING LTR NO.

00824 RF 95

DUE  
DATE

ACTION



Department of Energy

Mar 17 9 47 AM '95  
ROCKY FLATS FIELD OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

MAR 16 1995

EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

95-DOE-08227

Mr. Martin Hestmark  
U.S. Environmental Protection Agency  
ATTN: Rocky Flats Project Manager, 8HWM-FF  
999 18th Street, Suite 500  
Denver, Colorado 80202-2405

Mr. Joe Schieffelin, Unit Leader  
Hazardous Waste Control Program  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Gentlemen:

This letter is to inform you that the Department of Energy is initiating several changes to the Rocky Flats Environmental Technology Site (RFETS) FO.29 procedure entitled, "Disposition of Soil and Sediment Investigation-Derived Material (IDM)." The FO.29 procedure was developed to provide a risk-based methodology for removing IDM classified as Resource Conservation and Recovery Act (RCRA) "contained-in" hazardous waste out of the hazardous waste classification. The IDM must be at or below the allowable risk values required by the Colorado Department of Public Health and Environment (CDPHE) in order to be classified as non-hazardous.

1. The FO.29 procedure also provided a methodology for performing a risk analysis for hazardous substance constituents outside of the RCRA hazardous waste definitions. By using the methodology in the procedure, a new category of waste has been identified at RFETS which is not required by Federal or state environmental regulations. No methodology exists under CERCLA to perform a risk analysis on an individual drum of IDM. Therefore, the parts of the FO.29 procedure that refer to the non-RCRA risk analysis for containerized IDM will be eliminated from the procedure.
2. An addendum to the FO.29 procedure is currently being developed at RFETS to address the radioactivity determination of IDM. The addendum will provide a risk-based approach for determining whether or not a container of IDM must be considered low level waste (LLW). Department of Energy (DOE) Headquarters (HQ) approval must be received before any waste identified as non-LLW is shipped offsite, but onsite disposition based on the risk calculations will be allowed. DOE-HQ approval is expected to take between six months to two years. The addendum is expected to be finalized and submitted to DOE-HQ in the early part of the fiscal year 95 third quarter. It will be made available for your information at that time.

CORRES. CONTROL X X  
ADMN RECORD/080 X  
PATS/T130G

Reviewed for Addressee  
Corres. Control RFP

3-17-95 RDE  
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

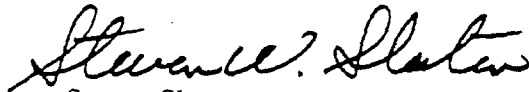
ADMIN RECORD  
SW-A -002786

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3. Finally, the FO.29 procedure will be expanded to address all Environmental Restoration (ER) RCRA "contained-in" hazardous waste, not just soil and sediment IDM. This modification of the procedure is expected to take place within this fiscal year.

We are aware that these are significant changes to the FO.29 procedure, and that CDPHE and EPA may have questions or need clarification on the above subjects. Please contact Brandon Williamson at 966-5276 for any additional information you may need. We will be happy to set up a meeting to discuss these changes if you so desire. If we do not hear from you regarding the above changes by March 24, 1995, DOE will proceed with all changes.

Sincerely,



Steven Slaten  
IAG Project Coordinator  
Environmental Restoration

cc:

J. Roberson, AMER, RFFO  
F. Lockhart, DAMER, RFFO  
B. Thatcher, ERPD, RFFO  
B. Williamson, ERPD, RFFO  
V. Witherill, ERPD, RFFO  
J. Stewart, SAIC  
S. Stiger, EG&G  
K. Anderson, EG&G  
M. Broussard, EG&G  
L. Gregory-Frost, EG&G